

David H. Krieger, Esq.  
Nevada Bar No. 9086  
Shawn W. Miller, Esq.  
Nevada Bar No. 7825  
KRIEGER LAW GROUP, LLC  
2850 W. Horizon Ridge Pkwy, Suite 200  
Henderson, Nevada 89052  
Phone: (702) 848-3855  
dkrieger@kriegerlawgroup.com  
smiller@kriegerlawgroup.com  
Attorneys for Plaintiff,  
*Gloria Flores*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

GLORIA FLORES,

Plaintiff(s),

vs.

EQUIFAX INFORMATION SERVICES,  
LLC,

Defendant(s).

Case No.: 2:21-cv-00974-JAD-BNW

**DISCOVERY PLAN AND  
PROPOSED SCHEDULING  
ORDER**

**SUBMITTED IN COMPLIANCE WITH LR 26-1(b)**

Gloria Flores (“Plaintiff”) and Equifax Information Services, LLC (“Equifax”), collectively the “Parties”, by and through their counsel of record, hereby submit their stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 16 and 26, as well as LR 16-1 and 26-1. It is hereby requested that the Court enter the following discovery plan and scheduling order:

**1. Discovery Plan:**

Discovery Cut-Off: **February 14, 2022** (180 days from the date Defendant filed its Answer, August 16, 2021).

Deadline to Amend Pleadings: **November 15, 2021** (90 days prior to the close of discovery).

Deadline to Disclose Initial Expert Disclosures: **December 15, 2021** (60 days prior to the close of discovery).

Deadline to Disclose Rebuttal Expert Disclosures: **January 14, 2022** (30 days after the Initial Disclosure of Experts).

Deadline to File Dispositive Motions: **March 15, 2022** (30 days after the close of discovery).

**2. Pre-Trial Order:** The Parties shall file a joint pretrial order no later than **April 15, 2022** or thirty (30) days after the date set for filing dispositive motions. In the event that the Parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motions or further order of the Court. The disclosure required by Federal Rule of Civil Procedure 26(a)(3) and objections thereto shall be made in the pre-trial order.

**3. Initial Disclosures:** The Parties shall make initial disclosures on or before **September 16, 2021**. Any Party seeking damages shall comply with Federal Rules of Civil Procedure 26(a)(1)(A)(iii).

**4. Extension of Discovery Deadline:** Requests to extend the discovery shall comply fully with LR IA 6-1 and 26-3.

1           **5. Electronically Stored Information (“ESI”):** The Parties stipulate and agree  
2 that all discoverable documents will be produced in electronic format, text searchable  
3 when reasonably practicable, and provided in electronic formats that are widely available  
4 and accessible (e.g., CD-ROM, DVD, USB storage device, PDF, MP3, WAV, MIDI).  
5 The Parties further agreed that the “parent-child relationships” between documents will  
6 be preserved when documents are produced (e.g., e-mails and their attachments will be  
7 produced together with consecutive bates numbers) as reasonably practicable. While the  
8 Parties agree at this time that it is not necessary to produce the metadata for electronic  
9 documents, the Parties reserve their respective rights to request such information should  
10 any Party deem it necessary. This agreement only determines the format in which the  
11 Parties produce documents; it does not affect any other right of any Party.

12           **6. LR 26-1(b)(7) CERTIFICATIONS:** The Parties certify that they  
13 considered consenting to trial by a magistrate judge and use of the Short Trial Program.  
14 The Parties further certify that they met and conferred about the possibility of using  
15 alternative dispute resolution processes including, mediation, arbitration, and early neutral  
16 evaluation.

17           **7. Electronic Service and Electronic Evidence (LR 26-1(b)(9)):** The Parties  
18 agree to accept electronic service of discovery requests, discovery responses and other  
19 papers pursuant to Federal Rule of Civil Procedure 5(b)(2)(E). The Parties discussed  
20 whether they intend to present evidence in electronic format to jurors for the purpose of  
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1 jury deliberations and agreed that should discovery be provided in an electronic format at  
2 trial, it will be compatible with the court's electronic jury evidence display system  
3 pursuant to LR 26-1(b)(9).  
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5 **8. Protective Orders:** Any Party may seek to enter into a stipulated protective  
6 order pursuant to Federal Rule of Civil Procedure 26(c) prior to producing any confidential  
7 documents in its possession. Such Party shall circulate a proposed protective order with  
8 its responses to the applicable discovery requests and, to the extent such Party is  
9 withholding documents, such Party shall produce those withheld documents subject to an  
10 entered protective order within two weeks from the date the court enters the protective  
11 order.  
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**9. Responses to Discovery served prior to the Rule 26(f) conference:** Unless agreed otherwise by the Parties, responses to discovery served prior to the Federal Rule of Civil Procedure 26(f) conference shall be due 33 days after the conference.

Dated September 3, 2021.

/s/ Shawn W. Miller

David H. Krieger, Esq.  
Shawn W. Miller, Esq.  
KRIEGER LAW GROUP, LLC  
2850 W. Horizon Ridge Parkway  
Suite 200  
Henderson, Nevada 89052  
Attorneys for Plaintiff  
**Gloria Flores**

/s/ Jeremy J. Thompson

Jeremy J. Thompson, Esq.  
CLARK HILL PLLC  
3800 Howard Hughes Drive  
Suite 500  
Las Vegas, Nevada 89169  
Attorneys for Defendant  
**Equifax Information Services, LLC**

### SCHEDULING ORDER

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED.



United States Magistrate Judge

Dated: September 7, 2021.